

**No. 04-19-00192-CR
No. 04-19-00193-CR
(Consolidated Causes)**

FILED IN
4th COURT OF APPEALS
SAN ANTONIO, TEXAS
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KEITH E. HOTTLE
CLERK

STATE OF TEXAS

§

IN THE COURT OF APPEALS

VS.

§

FOURTH JUDICIAL DISTRICT

JOHNNY JOE AVALOS

§

BEXAR COUNTY, TEXAS

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE OPENING BRIEF**

From the 437th District Court of Bexar County, Texas
Trial Court Nos. 2018-CR-7068 & 2016CR10374
Hon. Lorie Valenzuela, Judge Presiding

The Appellant's brief is due to be filed on Friday, July 12, 2019. The undersigned, a solo practitioner that handles trial and appellate law, presents grounds that he submits are extenuating, and requests a third and final, fourteen-day extension of time to file his brief, given finished, and due to be finished projects, as follows:

1. Memorandum in support of motion to suppress, in *United States v. Miguel Angel Lozano Alvarez*, Cause No. V-18-CR-17, filed on Monday, July 8, 2019;
2. Petition for a writ of certiorari with the U.S. Supreme Court, in *Luis Arnaldo Baez v. Lorie Davis*, stemming from a denial of Baez' 28 U.S.C. 2254 certificate of appealability, filed Monday, June 24, 2019;
3. Memorandum in support of motion to suppress, in *United States v. Mark Rodriguez*, Cause No. SA-18-CR-572-FB, filed on Friday, June 21st, 2019;

4. Trial preparation in *State of Texas v. Ivan Esparza-Quintanilla*, Cause No. 611810, set for jury trial on Monday, July 22, 2019, in County Court at Law #11;
5. Opening brief in *United States v. William Jonas, III*, Cause No. 18-50468, involving a multi-count, week-long trial with a voluminous record, due to be filed on Monday, August 9, 2019, with the Fifth Circuit Court of Appeals.

On Wednesday, June 12, 2019, the undersigned spoke to Ms. Shamika Roberts, of the Bexar County Appellate Section, who expressed no opposition to the requested, final extension.

WHEREFORE, Appellant respectfully requests that this Court grant the requested, and final 14-day extension of time to file his opening brief, to and including Friday, July 26, 2019.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this the 12th day of July, 2019 a copy of the foregoing “Unopposed Motion for Extension of Time to File Opening Brief,” has been delivered to the Appellate Section of the Bexar County District Attorney’s Office, *via* the Texas Efile system.

/s/ JORGE G. ARISTOTELIDIS